

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
)	
v.)	CASE NO. 1:17-CR-292-ELR-JEM
)	
ARTURO GONZALEZ-RENTERIA)	
Defendant.)	

**DEFENDANT’S MOTION TO ADOPT AND CONFORM MOTIONS AND
REQUEST FOR ADDITIONAL TIME TO FILE OBJECTION**

COMES NOW, the Defendant, Arturo Gonzalez-Renteria (hereafter “Renteria”), through undersigned counsel, and pursuant to applicable Federal Law, moves this Honorable Court for an Order granting the right to adopt, reallege, conform, and brief where necessary all Motions filed by counsel for Defendant charged in the above-captioned Second Superseding Indictment.

Furthermore, Defendant requests an additional 30 days to file objections to the Magistrate’s Report and Recommendation in the above-captioned matter. In support thereof, Renteria shows as follows:

1. Renteria filed a motion [Doc. 349] to stay the filing of objections to the Magistrate Judge’s Report and Recommendation (“R&R”) [Doc. 344] concerning Renteria’s motions to suppress.
2. Renteria’s motion to stay the filing of objections was granted on January 7, 2022 in an Order [Doc. 350] signed by Judge Eleanor Ross. A new

deadline for filing objections to the R&R on the motions to suppress was to be scheduled once the R&R to the motion to dismiss was issued.

3. Magistrate Judge Alan J. Baverman issued his R&R [Doc. 357] on Renteria's motion to dismiss on March 31, 2022. Renteria filed Objections [Doc. 362] to the R&R on April 14, 2022.
4. The Court issued its' Order [Doc. 366] overruling Renteria's objections and adopting the R&R on the motion to dismiss on May 13, 2022.
5. Renteria requests an additional thirty (30) days from June 8, 2022 to July 8, 2022 to file his objections to the R&R [Doc. 344] on Renteria's motions. The R&R consists of 67 pages of analysis on complex legal and evidentiary issues. This time would be excludable pursuant to the provisions of the Speedy Trial Act.

WHEREFORE, Mr. Gonzalez-Renteria moves this Court to grant an Order allowing him to adopt and reallege all of his motions from the prior indictment and to grant his request for an additional thirty (30) days from June 8, 2022, in which to file his Objections to the Magistrate's Report and Recommendation and to exclude the time pursuant to the provisions of the Speedy Trial Act pursuant to 18 U.S.C. § 3161 (7)(A).

This 7 day of June 2022.

Respectfully submitted,

/S/ Bruce Harvey

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CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing *Defendant's Motion To Adopt and Conform Motions And Request For Additional Time To File Objections* on opposing counsel by facsimile transmission, electronic delivery, by hand delivery, or by depositing a copy of the same in the United States Mail with sufficient postage thereon, addressed as follows:

Rebeca Ojeda, AUSA
75 Ted Turner Drive , Suite 600
Atlanta, Georgia 30303

This 7 day of June 2022.

Respectfully submitted,

/S/ Bruce Harvey
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